

## Curtis, Mallet-Prevost, Colt & Mosle LLP

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October 17, 2013

### **BY E-MAIL**

The Honorable Martin Glenn  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
One Bowling Green, 5<sup>th</sup> Floor  
New York, New York 10004

**Re: *In re Residential Capital, LLC, et al.,*  
Bankruptcy Case No. 12-12020 (MG) (Bankr. S.D.N.Y.)**

Dear Judge Glenn:

This firm is conflicts counsel for the debtors and debtors in possession (collectively, the "Debtors") in the above-referenced jointly administered Chapter 11 cases (the "Chapter 11 Cases").

In accordance with discussions held yesterday between Your Honor's chambers and Morrison & Foerster, the Debtors, in consultation with counsel to the Official Committee of Unsecured Creditors in the Chapter 11 Cases and with Your Honor's permission, have agreed to extend until October 23, 2013 at 4:00 p.m. PNC Bank N.A.'s time to further respond to the *Joint Motion Pursuant to 11 U.S.C. § 105 and Fed. R. Bankr. P. 7023 and 9019 for an Order (1) Granting Class Certification for Purposes of Settlement Only, (2) Appointing Class Representative and Class Counsel for Purposes of Settlement Only, (3) Preliminarily Approving the Settlement Agreement Between Plaintiffs, on Their Own Behalf and on Behalf of the Class of Similarly Situated Persons, and the Debtors, (4) Approving the Form and Manner of Notice to the Class, (5) Scheduling a Fairness Hearing to Consider Approval of the Settlement Agreement on a Final Basis and Related Relief and (6) Approving the Settlement Agreement on a Final Basis and Granting Related Relief* [Docket No. 4451] (the "Settlement Motion") so that the parties can continue discussions in an effort to achieve a consensual resolution to PNC Bank's limited objection to the Settlement Motion [Docket No. 4661]. Pursuant to the Order preliminarily approving the Settlement Motion [Docket No. 4808], the deadline for responding to the Settlement Motion was set as October 18, 2013.

If Your Honor or a member of Your Honor's staff should have any questions with respect to the foregoing, please feel free to contact me at (212) 696-8881.

Respectfully submitted,

/s/ Maryann Gallagher

Maryann Gallagher

**MEMORANDUM ENDORSED  
SO ORDERED.**

Dated: October 17, 2013  
New York, York

/s/Martin Glenn  
MARTIN GLENN  
United States Bankruptcy Judge

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